

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF WISCONSIN

3 -----
4 GREGORY BOYER, as administrator of the
5 Estate of Christine Boyer,
and on his own behalf,

6 Plaintiff,
7 vs. Case No. 20-CV-1123-jdp

8 ADVANCED CORRECTIONAL HEALTHCARE, INC.,
9 LISA PISNEY, AMBER FENNIGKOH,
STAN HENDRICKSON, DANIELLE WARREN,
SHASTA PARKER and MONROE COUNTY, WISCONSIN,

10 Defendants.

11 -----
12 GREGORY BOYER, as Administrator of the
13 Estate of Christine Boyer,
and on his own behalf,

14 Plaintiff,
15 vs. Case No. 22-CV-723-jdp

16 USA MEDICAL & PSYCHOLOGICAL STAFFING,
17 NORMAN JOHNSON, TRAVIS SCHAMBER,
WESLEY HARMSTON and JILLIAN BRESNAHN,

18 Defendants.

19 -----
20 Deposition of **KYLE MOGA**, a witness in the
21 above-entitled action, taken at the instance of the
Plaintiff, pursuant to notice of the examination
22 and service of subpoena on **November 3, 2023**,
commencing at 11:04 a.m. at 112 South Court Street,
23 Sparta, Wisconsin, pursuant to applicable Wisconsin
Statutes, before and reported by Nancy Johnson,
24 Registered Professional Reporter.

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1 I N D E X

2 Examination of KYLE MOGA

3 4 By ATTORNEY WEIL

Examination 3

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8 There were no exhibits marked.

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1 WHEREUPON,

2 KYLE MOGA,

3 was duly sworn by the Notary Public and
4 testified under oath as follows:

5 BY MR. WEIL:

6 Q Good morning, Mr. Moga.

7 A Good morning.

8 Q I just introduced myself to you. I'm Steve
9 Weil. I represent the Plaintiff in this case.

10 A Okay.

11 Q I want to start with a bit of your background.
12 Starting with, say, when you graduated from
13 high school. I just need a thumbnail sketch.
14 Nothing too in depth. So just walk me through
15 it, if you would?

16 A Okay.

17 Q Employment history and that kind of thing.

18 A I graduated from Winona Senior High School in
19 Winona, Minnesota.

20 Q What year?

21 A 2010.

22 Q Okay. Go ahead.

23 A At that time I was a lifeguard at the local
swimming pool for the summers. I then went to
work at Harley-Davidson in Winona and attended

1 A P P E A R A N C E S 2

2 STEPHEN H. WEIL
3 LOEVY & LOEVY, 311 North Aberdeen
Street, 3rd Floor, Chicago, Illinois, 60607,
4 appeared as counsel for and on behalf of
Gregory Boyer, as Administrator of the Estate
of Christine Boyer and on is own behalf,
5 Plaintiff.

6 DOUGLAS S. KNOTT
7 LEIB KNOTT GAYNOR, LLC, 219 North
Milwaukee Street, Suite 710, Milwaukee,
8 Wisconsin, 53202, appeared as counsel for and
on behalf of Advanced Correctional Healthcare,
9 Inc., Lisa Pisney and Amber Fennigkoh,
Defendants.

10 ANDREW A. JONES
11 HANSEN REYNOLDS, LLC, 301 North
Broadway Street, Suite 400, Milwaukee,
12 Wisconsin, 53202, appeared, as counsel for and
on behalf of Stan Hendrickson, Shasta Parker,
Danielle Warren and Monroe County, Defendants.

13 MARK W. HARDY
14 GERAGHTY, O'LOUGHLIN & KENNEDY, P.A.,
Wells Fargo Place, 27th Floor, 30 East Seventh
Street, St. Paul, Minnesota, 55101, appeared by
Zoom as counsel for and on behalf of USA
16 Medical & Psychological Staffing, S.C., Norman
Johnson, Tavis Schamber, Wesley Harmston and
Jillian Bresnahan, Defendants.

18 DANIEL KAFKA
19 LEIB KNOTT GAYNOR, LLC, 219 North
Milwaukee Street, Suite 710, Milwaukee,
Wisconsin, 53202, appeared by Zoom as counsel
20 for and on behalf of Advanced Correctional
Healthcare, Inc., Lisa Pisney and Amber
Fennigkoh, Defendants.

23 * * * * *

<p style="text-align: center;">5</p> <p>1 Minnesota Southeast Technical College for two 2 years for gen eds. Then I went to Winona 3 State, got my bachelor's degree in criminal 4 justice, law enforcement. Then after that went 5 to Jellystone Campground and I lived out there 6 for a couple months when I went to police 7 academy.</p> <p>8 Q What year was that?</p> <p>9 A 2015. And I worked out at Jellystone during 10 that time. And then graduated from Academy. 11 Got a job at Volk Field International Guard 12 Base for security forces, civilian. And then 13 went to, went and worked there for a little 14 bit. Went to UW-L, La Crosse, police 15 department for a little bit. Left there. Went 16 back to Volk Field. Came to Monroe County. 17 Worked here for a little over a year. Went 18 back to Volk Field. And then promoted. And 19 then started working at Dayton Freight and 20 that's where I currently am.</p> <p>21 Q You said Volk Field?</p> <p>22 A Yes.</p> <p>23 Q How do you spell that?</p> <p>24 A V-O-L-K. It's in Camp Douglas.</p> <p>25 Q And what is that?</p>	<p style="text-align: center;">7</p> <p>1 that here because the court reporter can't take 2 down two people talking at the same time.</p> <p>3 A Give her some time.</p> <p>4 Q That's right. Give her some time. Second rule 5 is, we can't -- nods of the head, which you're 6 giving me, which are fine in normal life, or 7 uh-huh, uh-uh, they don't work for the court 8 reporter, because she really can't take that 9 down. It's really hard for her to record a 10 gesture like that. And so instead, I ask you 11 to say yes, no, and then you can say whatever 12 you like after that, but just give a verbal 13 response like that that's clear for the court 14 reporter.</p> <p>15 A Okay.</p> <p>16 Q Does that make sense?</p> <p>17 A Yes.</p> <p>18 Q This isn't a memory test. I do not want you to 19 be guessing or speculating. However, I am 20 entitled to your best recollection and your 21 best estimate. Does that make sense?</p> <p>22 A Yes.</p> <p>23 Q I will try to be as clear as I can in asking 24 you questions.</p> <p>25 A Okay.</p>
<p style="text-align: center;">6</p> <p>1 A It's an International Guard base, like a 2 training base.</p> <p>3 Q It's part of Camp Douglas?</p> <p>4 A Yeah. Camp Douglas is the town. Volk Field is 5 the base there.</p> <p>6 Q Got it. I started us off and I forgot to give 7 you all these admonitions that I usually do for 8 depositions. We're sitting here in a room. 9 But this -- you're under oath now and this is 10 essentially -- we should treat it like we're at 11 trial where there's a judge and a jury.</p> <p>12 A All right.</p> <p>13 Q So there's a few things that come with that. 14 One is there's a court reporter here.</p> <p>15 A Yes. Sorry.</p> <p>16 Q Not at all. You're doing great. Have you ever 17 testified in court before?</p> <p>18 A No, I have not.</p> <p>19 Q Have you ever testified at a deposition?</p> <p>20 A No.</p> <p>21 Q Okay. So the trick with a court reporter is it 22 changes our conversation a little bit. 23 Usually, you know, it's common for people to 24 talk over each other a little, anticipating the 25 answer, anticipating a question. We can't do</p>	<p style="text-align: center;">8</p> <p>1 Q If there is something that's confusing to you 2 or you don't understand something, please let 3 me know and I'll do my best to rephrase or 4 clarify what I'm talking about. Does that make 5 sense?</p> <p>6 A Yes.</p> <p>7 Q The flip side of that is, if you're answering a 8 question, I'm going to assume you understand 9 the question I'm asking.</p> <p>10 A Okay.</p> <p>11 Q Is that fair?</p> <p>12 A Yep.</p> <p>13 Q In terms of your recollection, you know, it's 14 common during a deposition or in conversation 15 that something jogs your memory, you may give 16 an answer and say I don't know at one point or 17 part of an answer, we're talking along and you 18 may -- something may come to your mind that has 19 to do with that question that you hadn't 20 thought of before. If that ever happens, we 21 can pause, whatever, go back and clarify that 22 answer or fill it in, or what have you. Does 23 that make sense?</p> <p>24 A Yes.</p> <p>25 MR. JONES: Of everything he just said</p>

9

1 to you, I've noticed already. Do your absolute
 2 best to wait until he's done asking the
 3 question until you begin to respond, okay?

4 THE WITNESS: Okay.

5 BY MR. WEIL:

6 Q It's hard to do, what Mr. Jones just told you.
 7 We will break that rule, I'll guarantee you,
 8 but let's just both do our best, okay?

9 A Understood.

10 Q So I want to get a couple dates for the history
 11 that you just gave me. You said you were a
 12 lifeguard in the summers when you graduated
 13 from high school, is that right?

14 A Yes.

15 Q You received, I would imagine, some life saving
 16 training in that role?

17 A Yeah. Pretty, pretty extensive training.

18 Q And that training involved recognizing signs of
 19 someone who is having a hard time breathing or
 20 having a heart problem?

21 A Basic, just basic life saving techniques.
 22 Like, if somebody was choking they would, you
 23 know, do that sign, or if they were having a
 24 heart attack, maybe they would be saying my
 25 chest hurts, or, just the basics.

10

1 Q Was there an official training program you went
 2 through? Something at a local community
 3 college or anything like that?

4 A We went through Red Cross for that job.

5 Q Where was that?

6 A That was held at the aquatic center itself, Bob
 7 Welch Aquatic Center.

8 Q And the training involved, you said choking
 9 just now?

10 A Yeah. CPR, AED, basic first aid and then
 11 water, water saving.

12 Q Pulling people out of the water?

13 A Yeah, drowning.

14 Q So pulling them out and saving them once they
 15 are out?

16 A Correct.

17 Q And, in particular, CPR, AED?

18 A Yes.

19 Q And I know that you were involved in rescuing
 20 Ms. Boyer from the records that we have in this
 21 case. Were you ever involved in any rescue
 22 similar to that?

23 A Probably just when I was -- as a lifeguard.

24 Q Did you ever give CPR other than to Ms. Boyer?

25 A Other than Ms. Boyer?

11

1 Q Um-hum.

2 A Not that I recall.

3 Q What did you do to prepare -- well, let me back
 4 up. Any other training that you had in life-
 5 saving at any of those other roles?

6 A I've gone through quite a bit of training
 7 through Police Academy, uhm, but it's mainly
 8 just the same amount of training, just
 9 refreshers for the same type of training, but
 10 refreshers.

11 Q So the same type of CFR, AED training and that
 12 kind of thing?

13 A Yep.

14 Q And that would have been in 2015?

15 A Yes.

16 Q And you received refreshers after that?

17 A Not that I -- as pertaining to the jail or
 18 anywhere else, no, not that I recall.

19 Q No training at the Monroe County Jail regarding
 20 CPR or AED?

21 A Not that I can remember.

22 Q Did you receive any training at the jail that
 23 you recall?

24 A Yeah. We had, like, use of force training,
 25 POSC. There was, like, an Alzheimer's

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1 awareness training, computer training. Uhm, we
 2 did yearly trainings. I don't remember exactly
 3 every training that we did, or -- mainly I can
 4 remember POSC and, like, restraint, doing the
 5 restraint chair kind of thing.

6 MR. JONES: POSC is P-O-S-C?

7 THE WITNESS: Yes.

8 BY MR. WEIL:

9 Q Remind me if you could, as I'm writing down
 10 fairly quickly your history. When did you
 11 become a guard at the Monroe County Jail?

12 A I want to say 2019, I believe.

13 Q About when in that year?

14 A Earlier on in the year. I don't remember
 15 exactly.

16 Q That's fine. You had been there for at least
 17 several months by the time of the Boyer
 18 incident?

19 A Yeah, that's correct.

20 Q And when did you leave Monroe County Jail?

21 A 2000 -- early 2020.

22 Q About how long after the Boyer incident did you
 23 leave the jail, would you estimate?

24 A Let's see. Between two and four months.

25 Q What did you do to prepare for your deposition

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<p>1 today, Mr. Moga?</p> <p>2 A Just had predeposition with my lawyers and that</p> <p>3 was about it.</p> <p>4 Q Okay. So you met with your lawyers?</p> <p>5 A Yes.</p> <p>6 Q I'm not going to ask, and I don't want you to</p> <p>7 tell me anything, the substance of the</p> <p>8 conversation you had with your lawyers. Can</p> <p>9 you tell me when you met with them?</p> <p>10 A One, one time was when we first were going to</p> <p>11 schedule this deposition about a year ago. And</p> <p>12 then a few days ago.</p> <p>13 Q Meeting in person? Over the phone? Zoom?</p> <p>14 A First time it was in person. Actually, I think</p> <p>15 there might have been a second time over, over</p> <p>16 Zoom. And then this most recent time, so three</p> <p>17 times.</p> <p>18 Q Okay.</p> <p>19 A The third time was over video chat.</p> <p>20 Q Did you review any documents to prepare for</p> <p>21 your deposition today?</p> <p>22 A Yes.</p> <p>23 Q Can you tell me which ones you reviewed?</p> <p>24 A The Cell Check Log, my Supplemental Report, and</p> <p>25 the Master Control Log.</p>	<p>1 A Correct.</p> <p>2 MR. JONES: Which exhibit did you say</p> <p>3 this was?</p> <p>4 MR. WEIL: This is 41.</p> <p>5 MR. JONES: Thank you.</p> <p>6 BY MR. WEIL:</p> <p>7 Q This report involves this event, this medical</p> <p>8 event with Christine Boyer, correct?</p> <p>9 A Correct.</p> <p>10 Q I'll ask you to set it aside in your mind. You</p> <p>11 can close it. I want to ask you if you have an</p> <p>12 independent recollection of that medical event.</p> <p>13 Setting aside what you reviewed, discussions</p> <p>14 with your lawyers, is this something in your</p> <p>15 mind you remember?</p> <p>16 A Yes. Yes.</p> <p>17 Q What can you tell me? Maybe we'll back up a</p> <p>18 little. You said you reviewed the Cell Check</p> <p>19 Log?</p> <p>20 A That's correct.</p> <p>21 Q Why don't we start with your presence in the</p> <p>22 jail on the day of the event? It's early</p> <p>23 morning hours of December 23rd, correct?</p> <p>24 A I believe so, yes.</p> <p>25 Q Can you tell me why -- what shift you were on</p>
14	16
<p>1 Q Anything else?</p> <p>2 A I don't believe so.</p> <p>3 Q Any emails or correspondence you might have</p> <p>4 reviewed?</p> <p>5 A Oh, yes. There was an email that somebody had</p> <p>6 sent out about medication being dropped off by</p> <p>7 Mr. Boyer.</p> <p>8 Q Anything else?</p> <p>9 A No.</p> <p>10 Q Do you have an independent recollection of --</p> <p>11 well, let me back up. You talked about the</p> <p>12 Supplemental Report that you did. I'm going to</p> <p>13 hand you what's been previously marked as</p> <p>14 Exhibit 41.</p> <p>15 A Do you want me to look at all of the reports or</p> <p>16 just mine?</p> <p>17 Q My first question is just, is this the document</p> <p>18 you reviewed?</p> <p>19 A Not this one, no. I have reviewed just mine.</p> <p>20 Q Just your report?</p> <p>21 A Yes.</p> <p>22 MR. JONES: Last page.</p> <p>23 BY MR. WEIL:</p> <p>24 Q So the only report you reviewed was yours and</p> <p>25 not these other reports, is that right?</p>	<p>1 at the jail at that time?</p> <p>2 A Typically I worked night shift, so six p.m. to</p> <p>3 six a.m.</p> <p>4 Q Okay. So that would have been six p.m. on the</p> <p>5 22nd to six a.m. on the 23rd?</p> <p>6 A Correct.</p> <p>7 Q And that was your shift, that time you were</p> <p>8 there?</p> <p>9 A It should have been, yeah. That's my normal</p> <p>10 hours.</p> <p>11 Q Do you have a recollection of what your routine</p> <p>12 was that day? What you did on the shift?</p> <p>13 A I was working housing or back in housing doing</p> <p>14 cell checks.</p> <p>15 Q Maybe I'll ask it a little bit more. Let's</p> <p>16 walk through the shift. You would get there at</p> <p>17 six p.m. Where do you go?</p> <p>18 A You would get your radio or keys or whatever</p> <p>19 you need in booking and you come in. You would</p> <p>20 go and get your radio from Master Control</p> <p>21 through the little slot and whatever keys you</p> <p>22 need and then you would walk back to housing.</p> <p>23 Q So you -- job starts. Pull into the parking</p> <p>24 lot. You walk into booking?</p> <p>25 A Correct. Or you walk into the sally port, then</p>

<p style="text-align: center;">17</p> <p>1 into the initial booking area and then the big 2 booking area.</p> <p>3 Q Okay. So you walk into the booking area. You 4 said you get a radio from the Master Control?</p> <p>5 A Yep.</p> <p>6 Q And then you walk into housing, is that right?</p> <p>7 A Yeah. Radio, keys, whatever else you may need 8 and then you walk through booking down the long 9 housing hallway and then up into housing 10 control there.</p> <p>11 Q Were there specific assignments that you had on 12 that shift in terms of where you were in the 13 jail?</p> <p>14 A No. It could differ every day. Just whatever 15 everybody wanted to do.</p> <p>16 Q How many folks were at the jail on any one 17 shift?</p> <p>18 A Usually about four, because you needed somebody 19 for Master Control, booking, and then at least 20 two in housing, so five would have been ideal 21 to have, but usually four to five.</p> <p>22 Q All right. And do you recall where you were 23 after walking to booking, getting the radio 24 from Master Control, where you spent that 25 shift?</p>	<p style="text-align: center;">19</p> <p>1 A What's a milieu?</p> <p>2 Q Out in the pod?</p> <p>3 A Yeah, before 10:00 o'clock, yeah. They can 4 kind of come and go as they please and then at 5 10:00 o'clock they are in their cells, doors 6 are locked. Other than the, like the -- what 7 do they call it? The nonpod units where they 8 are in the dorms. Then they are able to be 9 free. They don't have to lock down anywhere. 10 They can sleep or stay up.</p> <p>11 Q Okay. Do you recall, other than the event with 12 Ms. Boyer, which sticks in your mind, is there 13 anything else from that shift up to then that 14 you remember, in particular?</p> <p>15 A Let's see. I remember -- are you talking about 16 for that day?</p> <p>17 Q Yeah. That shift. So you get there at six. 18 Between shift -- we'll get to the emergency of 19 Ms. Boyer. From the --</p> <p>20 A Shift and the emergency.</p> <p>21 Q From the shift to the emergency, do you have 22 any recollection of anything in particular?</p> <p>23 A Not that I can recall. I think it was just 24 everything as usual.</p> <p>25 Q Just a normal night at the jail?</p>
<p style="text-align: center;">18</p> <p>1 A Housing.</p> <p>2 Q Were you there the entire time?</p> <p>3 A Other than.</p> <p>4 Q Leading up to Ms. Boyer's event. I understand 5 that changed things, but leading up to the 6 medical event she had?</p> <p>7 A Yes.</p> <p>8 Q What were you doing in housing during that 9 time?</p> <p>10 A Just normal housing duties. I would do cell 11 checks every hour. Get inmates things that 12 they need. Fill out -- what are they called? 13 Inmate Request Forms, or take them, or do mail, 14 sort out mail and hand out mail, depending on 15 if it was the day for that.</p> <p>16 Q I would imagine it's a bit more quiet much of 17 the shift, just because folks are in bed?</p> <p>18 A Yeah. Usually after, I think 10:00 o'clock was 19 the lockdown. And then after that everyone 20 would settle in, at least in the pods.</p> <p>21 Q I broke the rule there. So they are in their 22 pods. So before ten, folks are out in the 23 milieu. Generally there might be some people 24 in cells, but people are in the milieu and then 25 at ten there's a lockdown?</p>	<p style="text-align: center;">20</p> <p>1 A Yeah. Nothing that sticks out.</p> <p>2 Q Do you recall any particular -- again, we're 3 setting aside Ms. Boyer.</p> <p>4 A Yep.</p> <p>5 Q From the time you're called, we are setting 6 that aside.</p> <p>7 A Yep.</p> <p>8 Q Before that, do you recall interacting with any 9 particular employees at the jail, either 10 medical or correctional staff?</p> <p>11 A Not that I can recall. I mean, other than just 12 your normal interactions, just day to day.</p> <p>13 Q Do you recall an inmate named Danny Dake?</p> <p>14 A No, I do not.</p> <p>15 Q Do you recall someone receiving wound care at 16 the time of the shift?</p> <p>17 A Danny Dake, no, I don't.</p> <p>18 Q Forgetting a name, do you recall anybody 19 receiving special medical care during the 20 shift?</p> <p>21 A Not that I can recall, no.</p> <p>22 Q Is there a place -- if someone were receiving 23 special medical care, or, you know, they had 24 wounds or something like that, is there a 25 special place they would be housed in the jail?</p>

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<p>1 A They are kind of all over. There are some 2 inmates that had certain issues or medical 3 issues that they would come to the nursing 4 office and get their medical issue taken care 5 of and then be sent back to wherever they are, 6 wherever they are housed.</p> <p>7 Q And then the other folks would be in booking, I 8 assume, if they had a medical issue?</p> <p>9 A Yeah. If it was something that needed to be 10 closely, or closer looked at, yeah.</p> <p>11 Q Were nurses out in the general population area 12 of the jail or were inmates brought to them?</p> <p>13 A They were out in the general population if they 14 were doing med pass.</p> <p>15 Q And that's when they were -- I'm sorry. Go 16 ahead.</p> <p>17 A I'm sorry. Other than that, they were in their 18 -- in the nurse's office.</p> <p>19 Q And where was the nurse's office in relation 20 to booking?</p> <p>21 A Halfway in between booking and housing.</p> <p>22 Q Do you recall seeing Amber Fennigkoh at any 23 point in that shift?</p> <p>24 A I don't recall seeing her, but, I mean, she was 25 there usually for a little bit after our shift</p>	<p>1 A Just down the hallway.</p> <p>2 Q Okay.</p> <p>3 A It's a decent amount of space to cover from 4 housing to booking, but it's nothing too crazy.</p> <p>5 Q Sure. Give me an estimate. Just 20 feet? 6 Hundred feet?</p> <p>7 A I would say between 50 and 100 feet.</p> <p>8 Q And you got a call over the radio. The radio 9 that you had on you?</p> <p>10 A Correct.</p> <p>11 Q Approximately, and what were you told?</p> <p>12 A I don't remember the exact wording, but it was 13 enough to have us respond from housing to 14 booking in an emergent manner.</p> <p>15 Q You knew it was an emergency?</p> <p>16 A Yeah.</p> <p>17 Q Is there a code that's called, or anything like 18 that?</p> <p>19 A No. A lot of plain talk.</p> <p>20 Q And that was Danielle Warren calling you?</p> <p>21 A Yes.</p> <p>22 Q So you were -- I cut into your, what you were 23 narrating. Go ahead.</p> <p>24 A We responded to booking to where Danielle was, 25 and I don't remember which booking cell, but</p>
22	24
<p>1 had started.</p> <p>2 Q Okay.</p> <p>3 A For night shifts.</p> <p>4 Q So you would typically overlap with her at some 5 point at the beginning of your shift?</p> <p>6 A Yeah.</p> <p>7 Q She would be essentially completing her shift 8 and you would be beginning yours?</p> <p>9 A Correct.</p> <p>10 Q Do you recall seeing her on Sunday the 22nd?</p> <p>11 A No, I do not.</p> <p>12 Q Let's talk about the medical event with Ms. 13 Boyer. What do you remember from -- when did 14 you learn about that event?</p> <p>15 A I remember Sergeant Warren calling for 16 assistance. I think it was Jeff Schwanz, him 17 and I came down to booking. Danielle was in 18 her -- or, in Kristine's cell.</p> <p>19 Q Let me slow you down just for a sec. Do you 20 remember where you were --</p> <p>21 A Oh.</p> <p>22 Q -- when you got that call?</p> <p>23 A Housing.</p> <p>24 Q Do you remember how -- just any particular 25 spot? Did you have a long way to go?</p>	<p>1 one closer to the main booking door from 2 housing.</p> <p>3 I saw Christine on the floor, laying 4 on her back. Danielle was trying to -- was 5 saying her name. I don't remember if she was 6 shaking her or not. I pulled out my flashlight 7 and aimed it at Christine so I could get a 8 better view, because it's not really super 9 bright in there at night. And I saw that she 10 was gasping for air. She was discolored in the 11 face and her eyes were open. She was gasping 12 for air.</p> <p>13 So I told Danielle to get an AED. I 14 radioed to Master to call 911. And then I 15 asked for a shears. Somebody brought me a 16 shears or scissors or something. I cut 17 Kristine's clothing off so that she was exposed 18 so that I could put AED pads on her. Started 19 CPR. Eventually the AED got there. I put the 20 AED on.</p> <p>21 Sorry if I'm going too fast.</p> <p>22 Put the AED on. Listened to the AED.</p> <p>23 It said shock advised. I shocked her. We 24 pulled her out into the, the commons, booking, 25 so there was more room to work on her. By that</p>

<p style="text-align: right;">25</p> <p>1 time Alex Maas and Fritz Degner, they came to 2 help take the over CPR. Maas took over CPR. 3 Degner and I went back and forth on the bag 4 valve mask for her, to get air in her. And I 5 remember EMTs arrived. They took over care. 6 They did what they did. And then eventually 7 she got taken to the hospital from the 8 ambulance.</p> <p>9 Q When you first saw Christine as you described, 10 did anything in your training indicate what 11 sort of problems she might be having?</p> <p>12 A Nothing in my training, but just recognizing 13 that she wasn't -- that I could tell she wasn't 14 breathing. That she was gasping for air. It 15 just, it made me realize that there was an 16 emergency and that I needed to at least get an 17 AED on her to figure out if there was a heart 18 rhythm or something like that. And if she's 19 not breathing, that's going to tell me that she 20 needs CPR.</p> <p>21 Q You report, in your report you note that her 22 face, you saw her facing turning purple?</p> <p>23 A Purple, red.</p> <p>24 Q Is that consistent with what you remember?</p> <p>25 A Yeah, yep. Discolored.</p>	<p style="text-align: right;">27</p> <p>1 airway could stay open, while Fritz was running 2 the bag valve mask trying to get air in her. 3 Q Eventually the EMTs wheel her out? 4 A Yes. 5 Q Do you know -- the helicopter arrives at some 6 point, correct? 7 A I wasn't aware. 8 Q You didn't know one way or the other? 9 A Uh-uh. 10 Q The end of your report says, and feel free to 11 look at it. I'm on Exhibit 41. It says, after 12 paramedics left the jail, I followed up with 13 jail staff on shift to make sure everyone was 14 okay. Do you see that? 15 A Yep. 16 Q Can you tell me what you meant by that? 17 A So I just did like a small debrief, like a 18 quick debrief with everybody. I went around 19 and made sure that everybody was okay, because 20 I know Sergeant Warren was a little shook up 21 by the incident, so I checked in with her to 22 make sure she was doing okay. Checked in with 23 Jeff. And I don't know if I talked to Lucas or 24 not. I think he was in Master Control, but 25 everybody that was there for it, I tried to</p>
<p style="text-align: right;">26</p> <p>1 Q Did that have any indication to you, in light 2 of your training, life saving training, about 3 any problems she might be having?</p> <p>4 A Just that she -- not any specific training that 5 I can remember that would tell me that that's 6 going to be because of -- or that her face is 7 discolored, so that means this. But just 8 knowing that she wasn't getting air and that 9 her face was turning color would indicate to me 10 that she's not, she's not getting air and she's 11 losing some kind of circulation.</p> <p>12 Q You said eventually EMTs showed up?</p> <p>13 A Yes.</p> <p>14 Q Did you ever speak with any of them?</p> <p>15 A Not that I recall.</p> <p>16 Q Do you know, do you recall who might have 17 spoken with them?</p> <p>18 A No, I don't. As soon as they took over, we, 19 or, I just kind of stepped back and let them 20 take over because they can give better care.</p> <p>21 Q What happened when the EMTs showed up after 22 that?</p> <p>23 A Such as? Or what do you mean?</p> <p>24 Q What did you do? Or what were you doing?</p> <p>25 A I was holding Cristine's head back so that her</p>	<p style="text-align: right;">28</p> <p>1 check each person, make sure that they were 2 doing okay.</p> <p>3 Q Was everybody kind of shook up?</p> <p>4 A I think a little bit. I think Sergeant Warren 5 was probably the most shook up. Emotional.</p> <p>6 Q How so?</p> <p>7 A She was crying and a little distraught, I 8 guess, or flustered. Distraught, I would say.</p> <p>9 Q Do you remember anything she said?</p> <p>10 A No, I don't.</p> <p>11 Q You said you checked in with Jeff?</p> <p>12 A Yeah.</p> <p>13 Q And, I'm sorry, I'm forgetting everyone's 14 names.</p> <p>15 A Jeff Schwanz.</p> <p>16 Q Jeff Schwanz?</p> <p>17 A Yep.</p> <p>18 Q Jeff Schwanz was in housing with you, right?</p> <p>19 A Yeah.</p> <p>20 Q So you were two of the first people to respond?</p> <p>21 A Yeah. Danielle and then him and I were the 22 only ones left in the jail other than Lucas in 23 Master Control, but he's not able to leave.</p> <p>24 Q Do you remember how Jeff was doing?</p> <p>25 A He seemed to be calm and collected, like he</p>

<p>1 usually is.</p> <p>2 Q Did he say anything about how he felt?</p> <p>3 A Not that I recall, no.</p> <p>4 Q Anybody else to check in with?</p> <p>5 A No.</p> <p>6 Q How were you doing?</p> <p>7 A My adrenalin was pumping and I was definitely aware of the situation and everything going on, but I was calm and able to finish what I was doing.</p> <p>11 Q What happened after you do this check and the paramedics have left? What happens after that?</p> <p>13 A I remember talking with, or noticing all of the equipment on the floor and the cell being open and just saying, like, hey, we just need to, like, leave the stuff where it is right now. I think I told Sergeant Warren that.</p> <p>18 Q Why did you think that?</p> <p>19 A Just because it was a serious incident and I figured that, I didn't know how -- where everyone was with their thinking, because it was a big incident for the jail. And I just wanted to make sure everybody left everything until Stan or Ryan came in, or whoever was able to take over.</p>	<p>29</p> <p>1 A Sorry. If we work overtime, our shift works until ten a.m. It's like a four hour -- we just do, like, 16-hour shifts is the longest we would work over.</p> <p>5 Q Do you have any memory about anything that happened at the jail after the incident with Ms. Boyer that you've talked about so far?</p> <p>8 A No, I do not.</p> <p>9 Q You don't remember talking with anybody about that shift?</p> <p>11 A No.</p> <p>12 Q You don't remember speaking with Stan Hendrickson or Ryan Hallman?</p> <p>14 A Not that I recall, no.</p> <p>15 Q Anybody else you might have spoken with?</p> <p>16 A Not that I can think of.</p> <p>17 Q Do you see Amber Fennigkoh on that shift at any point?</p> <p>19 A After the incident until I left?</p> <p>20 Q We're just talking about this one shift, yes.</p> <p>21 A Oh, just the one shift. No, I don't recall.</p> <p>22 No, not during that shift, no.</p> <p>23 Q So the shift ends. I understand -- as you know, I've deposed Shasta.</p> <p>25 A Yep.</p>
<p>30</p> <p>1 Q After you did that, what happened?</p> <p>2 A I don't recall. I'm pretty sure everything was left there.</p> <p>4 Q And what did you do after that?</p> <p>5 A I don't recall.</p> <p>6 Q Did you return -- do you recall returning to housing at any point during that shift?</p> <p>8 A I don't recall, but I know that if something like that were to happen, like, we always go back to taking care of our job duties. We have to.</p> <p>12 Q Do you remember anybody -- you said Stan or Ryan. That's Stan Hendrickson and Ryan Hallman, is that right?</p> <p>15 A Correct.</p> <p>16 Q Do you remember any of them arriving at the jail at any point?</p> <p>18 A I don't remember, no.</p> <p>19 Q Do you remember talking with anybody else during that shift about what had happened?</p> <p>21 A I don't remember, no.</p> <p>22 Q Did your shift end at six a.m. as scheduled?</p> <p>23 A It should have. If it didn't, there might have been overlap or something like that.</p> <p>25 Q Go ahead.</p>	<p>32</p> <p>1 Q Now Shasta Moga.</p> <p>2 A Yep.</p> <p>3 Q Congratulations.</p> <p>4 A Thank you.</p> <p>5 Q As I understand it from the deposition, you two were not married at that time, correct?</p> <p>7 A Correct.</p> <p>8 Q But you were living in the same place?</p> <p>9 A Yeah, I believe so. I believe so, yeah.</p> <p>10 Q Do you remember speaking with her at all on the shift instead of calling home or anything like that?</p> <p>13 A Not that I can recall.</p> <p>14 Q After the shift ends, what's the next time that you have -- do you end up at the jail?</p> <p>16 A I don't remember. It should have been, I guess, my next scheduled date to work. I'm not sure.</p> <p>19 Q You filled out the report there on Exhibit 41.</p> <p>20 When were you informed that you should do that?</p> <p>21 A Usually we want to get it typed out as fast as or as soon as we can while the information is fresh in our minds. So I don't know an exact date or time, but.</p> <p>25 Q Where would you type this information out,</p>

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1 physically? Where would you be doing that?
 2 A At one of the work computers.
 3 Q Is that in booking or somewhere else?
 4 A It could have been either, either housing or
 5 booking.
 6 Q So you would sit down at a computer and type
 7 this out?
 8 A Correct.
 9 Q Did anybody tell you that you should do that?
 10 A Not that I remember.
 11 Q There's, and how -- there's a -- if you look at
 12 the, your report, you know, it has a format
 13 here with Monroe County Sheriff's at the top.
 14 It has some information here at the bottom. Is
 15 that information, did you -- I guess the
 16 question is, what sort of form did you type
 17 this out on?
 18 A I'm not sure. I have no idea.
 19 Q Did you type out other reports than this one
 20 during your time at the Monroe County Jail?
 21 A Yeah, I have.
 22 Q Can you just tell me how that works? In terms
 23 of, do you have a computer with a little window
 24 you do typing stuff in? Is it a Word document
 25 that you sent to Buddy? Whatever it might be?

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1 A I honestly, I can't even remember what we typed
 2 it on. I see that it's, like, got the heading
 3 and everything. I just, I can't remember if,
 4 at the jail, if we used a certain, like,
 5 software or application or something like that.
 6 I can't quite remember.
 7 Q And do you remember -- there's a time stamp
 8 here that I see. 12/27/19, 21:38. Do you see
 9 that?
 10 A Yes.
 11 Q And is that consistent with your recollection
 12 of when you typed this out?
 13 A Yeah, that would make sense. That would make
 14 sense, yeah. So it would be a few days after.
 15 Q Okay.
 16 A And 9:38 would have been -- if that's the date
 17 -- if I was working that shift, that day.
 18 that's congruent with, with the six a.m. to six
 19 p.m. when I would have been working.
 20 Q At the top again, in this sort of format
 21 section, above the report, do you see a -- it
 22 says, Case Scenario for SO-CR 192109. Do you
 23 see that?
 24 A Yep.
 25 Q Do you understand what that designation refers

35

1 to?
 2 A A case number.
 3 Q And what is a case number? What is that?
 4 A It's just a, a set of numbers and letters for a
 5 specific incident.
 6 Q So a specific incident that's being
 7 investigated will be assigned a case number?
 8 A I would think any, any incident would have a
 9 case number. So any time you need to write a
 10 report, there would be a case number for it.
 11 Q How did you know, or, I'm trying to connect
 12 your writing of the report with this case
 13 number. How did you know that there would be a
 14 case number, or did you know? How did that
 15 work?
 16 A Usually, like, our Sergeant would give us that
 17 information. If there was, if there was a
 18 case, if there was a report that needed to be
 19 written, they would let us know what the case
 20 number would be.
 21 Q Okay. So your Sergeant would say something to
 22 the effect of, we need you to write a report
 23 about X incident. Here is the case number for
 24 it?
 25 A I believe so.

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1 Q Is that the best you recall?
 2 A Yeah. I can't quite remember the specifics of
 3 how we did that.
 4 Q Do you remember who might have asked you to
 5 write this report?
 6 A I do not.
 7 Q Do you remember who would typically ask you to
 8 write a report like this?
 9 A Not specifically. I mean, it's possible too
 10 that I wrote it in a Word document and then put
 11 it in, or gave it, or submitted it to my
 12 Sergeant.
 13 Q Would you just do that of your own volition as
 14 in no one told you to write it. You just
 15 started writing a narrative of what happened?
 16 A Yeah.
 17 Q Well, was that a common practice for you?
 18 A If we're involved in an incident, yeah.
 19 Q Okay. If it was in a Word document, where
 20 would you have done that? Would you have done
 21 that at the jail?
 22 A Yeah.
 23 Q Would that Word document be saved somewhere?
 24 A I can't remember if it was, because we had a
 25 system -- I can't remember what it was called

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1 -- that we would -- there would be a lot of,
 2 like, information for, like, inmates and stuff
 3 like that, and it was kind of like a catchall
 4 that you could upload, like, reports and other
 5 information to, so if that was there at that
 6 time, then that's -- I could have done that,
 7 written up a Word document and put it to that.

8 Q Do you think that's what happened?

9 A That's -- possibly.

10 Q Do you recall anybody talking with you about
 11 this case, the case number that's reflected
 12 here?

13 A I do not.

14 Q Were you ever -- did you ever speak with Jeff
 15 Spencer?

16 MR. JONES: About this incident?

17 MR. WEIL: Yes.

18 A Spencer?

19 Q Let me back up. Do you know who Jeffrey
 20 Spencer is?

21 A The name sounds familiar, but I can't -- I'm
 22 not sure who he is.

23 Q Was there anybody who came to you in sort of an
 24 investigative capacity about the Boyer
 25 incident?

38

1 A Not that I recall.

2 Q So no one -- you don't recall anybody
 3 interviewing you in any capacity about the
 4 Boyer incident?

5 A No.

6 Q You wrote this report about the Boyer incident.
 7 Did you have any other interaction with any
 8 supervisors or anybody like that sort of about
 9 the incident and what happened?

10 MR. JONES: Objection to form. You
 11 can go ahead.

12 A At some point, possibly, but I don't remember a
 13 specific sit-down conversation with anybody.

14 Q Okay. Who was your supervisor at the jail?

15 A A direct supervisor?

16 Q Sure. Let's start there.

17 A So Sergeant Warren.

18 Q Danielle Warren?

19 A Yep.

20 Q Did you ever speak with her about this
 21 incident, other than we talked about right
 22 there at the time where you're making sure
 23 she's okay. Any other time?

24 A Not that I can recall. It's not something that
 25 I really talked freely about, because I

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1 understood the severity of the incident. And
 2 also it was something that we all dealt with,
 3 so if we did talk about it, it was, hey, how
 4 are you doing? Are you doing okay, like,
 5 mentally, emotionally. It wasn't the specifics
 6 of the case or anything like that. It was more
 7 about personal well-being.

8 Q I understand. So talking with the people who
 9 were there?

10 A Yeah.

11 Q And seeing how they are doing?

12 A Yep.

13 Q So those conversations continued after this
 14 shift that you were on?

15 A If they did, that's the only thing I think that
 16 I would have talked about. I don't know for
 17 sure if it was talked about. I'm sure at some
 18 point it was talked about, whether it was with
 19 Danielle or Ryan or Stan, but I just don't
 20 remember the exact -- if -- I don't remember a
 21 time that it was talked about. Like a specific
 22 time, like they pulled me into their office to
 23 talk about it. I don't remember if that
 24 happened or not.

25 Q Here's what I think you're saying, and you can

40

1 correct me if I'm wrong. You remember there
 2 might have been general conversations about it
 3 after the shift in sort of an emotional
 4 capacity or the human capacity?

5 A Yes.

6 Q You're not sure exactly when those
 7 conversations occurred, is that fair?

8 A Correct.

9 Q And you may remember having those conversations
 10 with the folks that were there that night,
 11 right?

12 A Correct.

13 Q And then did you also have conversations like
 14 that with anybody else, like Stan Hendrickson
 15 or Ryan Hallman?

16 A I can't, I can't remember if there was a time.
 17 I mean, it wouldn't be, it wouldn't be wild to
 18 have talked about them or talked with them
 19 about the incident, because they are also my
 20 supervisors, but I just don't remember a
 21 specific time.

22 Q I would imagine your boss would want to know if
 23 you're doing okay?

24 A Right. Right.

25 Q Was that something that occurred?

	41		43
1	A	Not that I, not that I recall.	
2	Q	There was some correspondence a few days after 3 that's been produced in the documents that have 4 been gathered in this case, but a critical 5 incident debrief, kind of a group meeting. Is 6 that familiar to you at all?	
7	A	Not that I can remember.	
8	Q	Did you go to anything, any sort of a group 9 meeting where this was discussed?	
10	A	The only thing I talked about was with a 11 chaplain from Monroe County.	
12	Q	Did a chaplain come to the jail?	
13	A	No.	
14	Q	Okay. Where did you meet with the chaplain?	
15	A	I met with the chaplain -- where was it? I 16 think it was in the basement conference room of 17 the, of the jail, but it was on my off time.	
18	Q	Okay. Were you informed -- did you just happen 19 across this chaplain or were you informed that 20 the chaplain would be available?	
21	A	We had -- I had a card from the chaplain in my 22 wallet. And I remembered that we had a 23 chaplain for Monroe County, so I contacted him 24 to talk about how I was doing.	
25	Q	You called up the chaplain --	
	42		44
1	A	Yeah.	
2	Q	-- and asked him to come in and talk about how 3 you were doing?	
4	A	Correct.	
5	Q	Was this pretty hard on you?	
6	A	Yes. I mean, at first, and it was kind of a 7 sensitive time of the year. It was a high- 8 stress situation, so I was -- it weighed on me.	
9	Q	I'm going to show you a document. It's been 10 marked as Exhibit 13 in this case. Take a 11 minute to read. It's an email chain between 12 Danielle Warren and Shasta and just take a 13 minute to read it. And I have a couple 14 questions for you. And you can tell me when 15 you're ready, Mr. Moga.	
16	A	Okay.	
17	Q	Take your time.	
18	A	Okay.	
19	Q	There's two emails here where Shasta is 20 describing how you were handling this.	
21	A	Yeah.	
22	Q	Do you think those are accurate, or pretty 23 accurate reflections on how you were feeling?	
24	A	Yeah. I don't -- so reading these, it sounds 25 like there also might have been other things	
		MR. JONES: Just answer his questions. THE WITNESS: Okay. Sorry. I'm a first-timer. BY MR. WEIL: That's okay. Do you remember Shasta talking to you about how, or her interactions with Ms. Boyer and what happened on her part of the shift? I don't remember the specifics, no. Or if she did or not. Okay. Do you remember her talking about her trying to tend to Ms. Boyer's medical condition at all? I believe I was there when she had called the doctor. I think I was standing at the door with Christine. Is that what you mean? Is that where you were when she called? I believe I was standing at the door when she had to go make the phone call so that she wasn't just left by herself. Okay. So we've gone over your shift earlier? Um-hum. Are you referring to when Shasta made a call to the doctor -- let me back up. Shasta left the jail hours before Ms. Boyer's medical incident,	

	45		47
1	right?	1	there. Shasta had to go call the doctor on a
2	A Correct.	2	Protocol and then that's, that's all I
3	Q And so what you're referring to is a call that	3	remember.
4	she made several hours before the medical	4	Q What's a Protocol?
5	incident that we just talked about, correct?	5	A So a Protocol is a medical form, and we had a
6	A Correct.	6	list of them for a medical incident or if
7	Q I understood from what you told me earlier that	7	somebody is having something wrong, you decide
8	you were in housing the whole time. It sounds	8	which Protocol you need and then you follow the
9	like, now that we're getting some particulars,	9	step-by-step actions to take and questions to
10	that maybe it was a point at which you weren't	10	ask on the Protocol and then that's how you
11	in housing?	11	navigate your way through it.
12	A Yes.	12	Q So the Protocol had questions and actions to
13	Q Okay. Tell me about that.	13	take if a detainee was suffering from a
14	A So it's normal for inmates in housing to need	14	particular medical condition or appeared to be?
15	something, whether it's a different pair of	15	A Correct.
16	sandals or something out of their property that	16	Q And you walk into the property room and you --
17	they are able to have, so we're the ones that	17	you're walking into booking to get to the
18	go get it in the booking area, which was also	18	property room, is that right?
19	where the property room is. So we kind of go	19	A I don't know. I don't know why I was, what the
20	back and forth.	20	specific reason why I was down there was, but
21	Q Okay. So if I understand you correctly, some	21	if I was going to the property room, then, yes.
22	inmate in housing wanted something from their	22	If I was getting sandals, they were out in the
23	property or was asking you for something from	23	initial booking area. Those were kind of the
24	their property. You went to see about getting	24	main places that you would go.
25	it?	25	Q Okay. And you walk into booking, and you see
	46		48
1	A Yeah. Yeah.	1	Shasta and Ms. Boyer, is that right?
2	Q Okay.	2	A I don't remember what initiated it or how I
3	A There's a proper channel of how to get it.	3	became helping out or how I started helping.
4	Like a request form, stuff like that, but once	4	Q What did you do to help?
5	that's all okay, like, we're the ones that go	5	A Just, I stayed with Christine while Shasta went
6	and retrieve it.	6	and did whatever she needed to do for the
7	Q In that event, tell me what you recall. It	7	Protocol and I remember her having to call the
8	sounds like you had some sort of interaction	8	doctor.
9	with Ms. Boyer or Shasta at that time?	9	Q Okay. So you walk in and just, again, best
10	A I don't remember exactly why I was down there,	10	recollection here. Is Shasta in the middle of
11	because we can float around quite a bit,	11	filling out a Protocol? Is she telling you, I
12	especially since there's not always a lot of	12	need to fill out a Protocol? Help me out. Or
13	people, staff working. So whenever, if I was	13	how does that work?
14	down there, then I would have helped out in the	14	A I don't remember the specifics, other than her
15	situation, if somebody needed an extra hand or	15	needing to leave to go call the doctor. And I
16	something like that, like I would be able to	16	just stayed with Christine to make sure that
17	kind of be floating around there.	17	nothing else happened or so that somebody was
18	Q I understand. Do you recall being down there	18	there.
19	at some point during that evening?	19	Q Do you remember whether Christine was out of
20	A At some point, yes.	20	her cell or not when this happened?
21	Q Tell me about it.	21	A I don't believe so. I think she was just
22	A So I remember being in the doorway, sitting,	22	sitting on her bed.
23	or, standing there while Christine was sitting	23	Q Sitting on her bed inside of her cell?
24	on her bed. And Shasta had gone. I don't	24	A Yeah.
25	remember how it started. I just remember being	25	Q Did you go into the cell with her?

	49		51
1 A	I stood by the door, in the doorway.	1	you would need to call a doctor, we would have
2 Q	And do you know where Shasta went to make the	2	called the doctor based on the Protocol.
3 call?		3 Q	And typically I would imagine -- the Protocols
4 A	Usually we would go to the nurse's office,	4	I would imagine are all over the jail so you
5 because there's like a, I think there's a, like		5	have easy access, the guards have easy access,
6 a little thing with -- they are numbered. The		6	right?
7 doctor's number is on it and that.		7 A	Yeah. I think there was one in housing and one
8 Q	So did Shasta leave booking entirely to do	8	in booking.
9 that?		9 Q	And is it something like a three-ring binder
10 A	Yes.	10	with a bunch of different Protocols in it?
11 Q	There's a little, kind of a desk, as I	11 A	Either that or folders or something like that.
12 understand it in booking where she could have		12 Q	So when you walk in to booking for this errand
13 made the call as well?		13	that you were coincidentally there for, did
14 A	Yeah. There's a desk with some phones.	14	Shasta say anything to you?
15 Q	But, to your knowledge, she didn't make the	15 A	Not that -- I don't remember the specifics. I
16 call there, is that right?		16	remember, obviously, having some communication
17 A	Not that I remember.	17	with her, but I don't remember what was said.
18 Q	Were you the only person in booking at that	18 Q	But words to the effect of, I need to fill out
19 point?		19	a Protocol. I need to take it to call the
20 A	I don't remember.	20	doctor or something along those lines?
21 Q	How was Christine? Do you remember?	21	MR. JONES: Objection to form. You
22 A	I think she was just quiet and just sitting	22	may answer.
23 there.		23 A	Yeah. I would -- generally, yeah, I would
24 Q	Do you remember saying anything to her or her	24	assume that that's what she said.
25 saying anything to you?		25 Q	I'm just asking for what you remember.
	50		52
1 A	No, I don't.	1 A	Yeah.
2 Q	How did she look?	2 Q	I'm not trying to put words in your mouth.
3 A	I don't remember.	3 A	Yeah.
4 Q	Did she have -- do you remember her being	4 Q	You tell me your best recollection.
5 hooked up to a blood pressure cuff at all?		5 A	I understand. I don't remember the
6 A	Not that I remember.	6	conversation at all, just, but her and I being
7 Q	Any other -- sorry. I didn't mean to	7	in there and her having to go call the doctor,
8 interrupt.		8	there was, there was probably some
9 A	I was just going to say, if there would have	9	communication there between us saying what's
10 been -- if she would have been acting in a way		10	going on and why she's going to make a call to
11 or saying anything in a way that would have		11	a doctor.
12 caused an alarm, then I would have acted on		12 Q	Okay. So whatever specifics you said, you knew
13 that. Or I would have done whatever I felt was		13	that she filled out a Protocol and was going to
14 necessary for the Protocol, or at least radioed		14	go call a doctor, is that right?
15 somebody.		15 A	Yeah.
16 Q	Okay. Did Shasta ever talk to you about that	16 Q	Did you do any cell checks during that time?
17 call with the doctor?		17 A	Uhm, I can't remember.
18 A	Not that I recall, no.	18 Q	You told me that you looked at the Cell Check
19 Q	Had Shasta -- did you see a form in Shasta's	19	Log --
20 hand, like a Protocol in her hand when she went		20 A	Yes.
21 to see the doctor?		21 Q	-- to prepare for this deposition?
22 A	Not that I recall.	22 A	Yep.
23 Q	You mentioned a Protocol earlier, so that's why	23 Q	Did you see your entry anywhere on that log?
24 I'm asking.		24 A	Yes, I did.
25 A	Yeah. If somebody is having an incident where	25 Q	Where was it, do you remember?

	53		55
1	A I don't remember the exact time and day, but I know I put down phone. She was using the phone for a couple of the cell checks that I did.	1	Q Well, do you remember anything about being in booking? Ms. Boyer came in -- I'll represent to you she came in on the evening of the 21st, so Saturday the 21st.
2		5	A Okay.
3		6	Q Do you have any memory of that occurring?
4	Q And by her, you mean Christine Boyer?	7	A No, I do not.
5	A Christine Boyer, yes.	8	Q Okay. Would you expect that you would be working in housing -- well, do you have any memory at all of that previous shift?
6	Q What was your number for the Cell Check Log?	9	A Not really, no. Nothing that I can think of.
7	A 1265 or 65.	10	Q If you had been assigned in booking, would you expect to see your name here doing cell checks?
8	Q Sixty-five. Okay. I see -- I can flip this around and show you that I see one entry for 65 around 8:39 p.m. Is that what you remember?	11	A Yes.
9		12	Q Does that, the lack of your name, generally indicate to you that you were assigned to housing?
10		13	A Housing or Master Control.
11	A I don't remember the specific time.	14	Q Do you remember being assigned to Master Control that shift?
12	Q I'll show it to you real quickly.	15	A I don't recall, but if I'm not on the booking list, if I'm not the main person doing the booking checks, then I was either in housing or Master Control.
13	MR. WEIL: Any objection to me just flipping this around?	16	Q Do you know why you would show up one time at
14		54	56
15	BY MR. WEIL:	1	8:39 a.m. on the log if you were assigned to housing that shift?
16	Q So this is Exhibit 8. That's the Cell Check Log there. You can scroll up and down really quickly, Mr. Moga, and just tell me if you see your number anywhere else? That number 65.	2	3 A I may have came down to -- like I did in the following day, or whenever.
17		4	5 Q The following shift?
18		6	6 A Yes. I could have left housing to grab something for somebody or just been floating.
19		7	8 Q Would it be common to, say, fill in while someone takes a bathroom break, that kind of thing?
20		9	10 A Yeah.
21	MR. JONES: Actually, you know what? Here.	11	12 Q And the sequence like this, just looking at this, would it indicate some sort of random assignment like that where you would show up, lend a hand and go back to your previous post?
22	A I'm on there twice for a phone call at 17:54 and 18:20 for phone. And then one other time, for 8:39 a.m. And I put two for alert and quiet.	13	14 A Yeah. That could be. I mean, at any point too, if someone didn't want to work in housing anymore and wanted to work booking and vice versa, we could switch. We weren't locked into a certain post for the whole night.
23		15	16 Q But if that had occurred here, you would have a bunch of entries after that with 65, right?
24		17	18 A Yeah, right. Correct.
25		19	20 Q Then flip it over. The next day looks like you're there at 17:54, correct?

57	59
1 A Yep.	1 helping out. But I don't see 65 on these cell
2 Q So that would be right as your shift begins, 3 I'm assuming, if I understand things correctly?	2 checks. Does that make sense to you?
4 A Correct.	3 A Yeah.
5 Q When it says phone, what does that mean?	4 MR. JONES: Objection to form. Go
6 A She was using the phone.	5 ahead.
7 Q Do you have any recollection of that?	6 BY MR. WEIL:
8 A I do not.	7 Q Can you explain?
9 Q Okay. So this is, apart from, we talked about 10 your interaction a moment ago with Shasta 11 filling out the Protocol?	8 A Just usually only needed one person to do a -- 9 to log the cell check.
12 A Yes.	10 Q So even though she eventually, as I understand 11 it, went away from booking, as you recall, to 12 call in the Protocol, it doesn't reflect 13 somebody else making entries here, is that 14 right?
13 Q This is a different time, right?	15 MR. JONES: Objection to form. You 16 can answer.
14 A So this is the evening of the 22nd, right.	17 A Can you repeat it?
15 Q So this first entry at 17:54, and then it looks 16 like 18:20, so that's 5:54 p.m. and 6:20 p.m., 17 right?	18 Q Sure. I'm looking at the logs from 19:26 to 19 20:25. It looks like Shasta has entered Chest 20 Pain Protocol, right?
18 A Correct.	21 A Correct.
19 Q And both times Ms. Boyer is on the phone and 20 that's what you're recording?	22 Q And what you're telling me is that when she 23 completed the Protocol, you happened to be 24 there. She left to go make the call that you 25 would make to the provider, right?
58	60
1 any time, seeing her on the phone?	1 A Right.
2 A No.	2 Q And then it looks like there's another entry by 3 her at 20:39 and would that be consistent with 4 when she returned, in your memory?
3 Q Or hearing her talking on the phone?	5 MR. JONES: Objection to form.
4 A I do not recall. There were two options to use 5 a phone. There's a phone on the wall and 6 there's a rollable, like a mobile-type phone 7 she could have used at her cell as well.	6 A She -- I don't remember how long it took her to 7 make the phone call, but these -- each time 8 you're doing a cell check, it's, there's a 9 certain amount of time that you need to check 10 everybody in booking before you log the cell 11 check.
8 Q Can you tell from this observation log which 9 type of call that is?	12 So, from what I remember, I was there 13 long enough to let her relieve that spot in the 14 amount of time to make a phone call to get back 15 and also do all of the cell checks or all of 16 the booking checks.
10 A No, I cannot.	17 Q Okay. That's all we have with that document. 18 Now, the instruction, one of the instructions 19 Shasta was given that the document reflects is 20 to provide Ms. Boyer with aspirin.
11 Q Okay. And nothing in this document jogs your 12 memory at all about this check around six p.m. 13 on the evening of the 22nd, is that right?	21 A Okay.
14 A That's correct. I don't remember.	22 Q Where would someone get aspirin? A guard get 23 aspirin after receiving an instruction like 24 that?
15 Q I'm looking at the log. Who is 88?	25 A From the nurse's office.
16 A Shasta.	
17 Q Okay. That was Shasta?	
18 A Um-hum.	
19 Q And it indicates that she's doing a Chest Pain 20 Protocol for quite a bit of it. Do you see 21 that?	
22 A Yes.	
23 Q How does that work in terms of you making 24 entries here? I understood that you were, you 25 came in to help out at some point or ended up	

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1 Q Okay.
 2 A In between booking and housing.
 3 Q Do you remember Shasta coming back with aspirin
 4 or anything? Any sort of medication in her
 5 hands?
 6 A I don't recall.
 7 Q Eventually, obviously she returns, correct?
 8 A Yes.
 9 Q And what happened after that?
 10 A I don't recall.
 11 Q Did you essentially -- you're back. I'm going
 12 to go back to my task, or did you stick around
 13 at all, or?
 14 A I don't remember specifics.
 15 Q Do you remember Ms. Boyer saying anything to
 16 Shasta at any point?
 17 A No, I do not.
 18 Q And you don't remember Ms. Boyer saying
 19 anything to you, correct?
 20 A That's correct.
 21 Q What's the name of the chaplain who you spoke
 22 with?
 23 A I might have the card in my wallet.
 24 Q Take a look.
 25 A I can't remember if I still do or not. Jeff

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1 this is the first time I've seen this.
 2 Q Of course.
 3 A I'm not sure what this.
 4 Q I'm trying to anchor us to something that it
 5 appears that she was thinking about. That's
 6 all.
 7 A Right.
 8 Q I'm asking you if this jogs your recollection
 9 to anything that Shasta and you talked about
 10 after the event?
 11 A Yeah.
 12 MR. JONES: And what's the question?
 13 BY MR. WEIL:
 14 Q So do you remember her talking about, do you
 15 remember Shasta talking about trying to make
 16 sure she did everything right for Ms. Boyer?
 17 A I don't remember a specific conversation, no.
 18 Or that we even talked about it.
 19 Q Okay. It says, the next, after I lost it, the
 20 next sentence says, I went through everything
 21 in my head, like, 20 times trying to make sure
 22 I did everything Lisa told me.
 23 Again, you're not on this email. The
 24 question is just, does that jog your
 25 recollection at all about the things that

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1 Skinner.
 2 Q Does the card list a denomination?
 3 A It says chaplain.
 4 Q Okay. Do you remember, in conversations after
 5 this event, talking with Shasta and her saying
 6 that she did everything -- she was trying to
 7 make sure she did everything she was supposed
 8 to do with respect to caring for Ms. Boyer?
 9 A Like during or just in general?
 10 Q I'll just refer you to this email. Shasta
 11 writes to Danielle Warren, at about three p.m.
 12 on the 26th. She says, no problem. I'm doing
 13 the best I can. I just had this weird feeling
 14 I needed to call the jail at that exact moment.
 15 I wanted to see if I had done everything I was
 16 supposed to. When Lucas told me you guys had
 17 the AED hooked up to her, I lost it. Do you
 18 see that?
 19 A Yeah.
 20 Q Do you remember conversations about, with
 21 Shasta at any point thereafter about her
 22 wondering or asking or trying to assure herself
 23 that she had done everything she was supposed
 24 to do for Ms. Boyer?
 25 A No, I don't. I'm also not really sure what --

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1 Shasta was concerned about after Ms. Boyer
 2 passed.
 3 A No, it doesn't.
 4 Q Do you remember having conversations with
 5 Shasta along these lines of her trying to
 6 assure herself that she did everything that
 7 Lisa had told her to?
 8 A No, I don't recall.
 9 Q Do you know who Lisa is?
 10 A The jail doctor.
 11 Q Well, did you ever interact with Lisa?
 12 A I think there had been some Protocols that I
 13 had done throughout my time at the jail that I
 14 had called her for. Which was, like, in the
 15 middle of the night, so it was pretty much the
 16 only interactions I've had with her.
 17 Q Anything you recall about the substance of the
 18 conversations with her when you filled out
 19 those Protocols?
 20 MR. JONES: Conversations with Lisa?
 21 MR. WEIL: Yeah.
 22 A Just whatever I was doing the Protocol on. I
 23 mean, when I did those Protocols. And if I
 24 even talked to the doctor, if I needed to, I
 25 was very robotic with the questions that were

<p style="text-align: right;">65</p> <p>1 on, that were needing to be asked.</p> <p>2 Q Okay. So the Protocol involves filling out 3 information and then transmitting it?</p> <p>4 A Correct.</p> <p>5 Q Were you -- you have some medical training, but 6 you're not a medical professional, correct?</p> <p>7 A Correct.</p> <p>8 Q Were you careful to fill out those Protocols 9 every time?</p> <p>10 A Yeah, to the best of my ability.</p> <p>11 Q And then careful to transmit all the 12 information on those Protocols to Lisa or 13 whoever was on the other end of the phone?</p> <p>14 A That's correct.</p> <p>15 Q Are you familiar with Shasta filling out 16 Protocols like that?</p> <p>17 A No. You mean, like, am I -- do I know how she 18 does them?</p> <p>19 Q Did you ever talk about filling one out with 20 her?</p> <p>21 A No.</p> <p>22 Q Was she careful about how she filled them out, 23 if you know?</p> <p>24 A I don't know how she fills them out, but we've 25 all been trained the same, to get as much</p>	<p style="text-align: right;">67</p> <p>1 relaying the information to Lisa Pisney?</p> <p>2 A Not usually.</p> <p>3 Q Did you ever hear Lisa, or, I'm sorry, Shasta 4 relaying information to the outside 5 practitioner?</p> <p>6 A Like hear her myself?</p> <p>7 Q Yes.</p> <p>8 A No.</p> <p>9 Q And, again, this is not jogging your memory in 10 terms of your conversations with Shasta? This 11 email on Exhibit 13 about her concern about 12 relaying information to Ms. Pisney carefully?</p> <p>13 MR. JONES: Objection to form.</p> <p>14 A No, it does not.</p> <p>15 Q Do you recall her generally being concerned 16 about, without focussing on any words, that she 17 had done everything right that evening with 18 regard to Ms. Boyer?</p> <p>19 A I would think so. She's been in her position 20 for a long time, so I think that she did the 21 best that she could to her ability.</p> <p>22 Q Does she strike you as a careful person?</p> <p>23 A Yes.</p> <p>24 Q Eventually, you said a few months after Ms. 25 Boyer's incident you left the jail?</p>
<p style="text-align: right;">66</p> <p>1 information as you can and fill them out to the 2 best of your ability, because then you're the 3 one that is relaying the information that's 4 happening to the person that can provide more 5 care.</p> <p>6 Q Did it strike you that she was a careful person 7 about doing that? Conscientious?</p> <p>8 MR. JONES: Objection to form. You 9 can answer.</p> <p>10 A I would say that she was as reasonable as every 11 other officer that has had to do a Protocol.</p> <p>12 Q And you were all trained to relay that 13 information?</p> <p>14 A Correct.</p> <p>15 Q Okay. In your experience, were other officers 16 careful to relay that information as well in 17 Protocols?</p> <p>18 MR. JONES: Objection to form, 19 foundation. You can go ahead.</p> <p>20 A I don't know how, necessarily, every other 21 officer filled out their Protocols, but -- 22 because they are pretty -- the Protocols are 23 pretty straightforward. So I would say that 24 everyone else fills them out the same.</p> <p>25 Q Okay. Did you ever actually hear officers</p>	<p style="text-align: right;">68</p> <p>1 A Correct.</p> <p>2 Q And you -- was this, was the jail your only -- 3 the only time you worked in corrections?</p> <p>4 A Yes.</p> <p>5 Q Why did you go into the corrections field?</p> <p>6 A It was a little bit higher pay and it was a 7 different avenue of law enforcement that I was 8 interested in.</p> <p>9 Q Okay. Before you had been working security at 10 Volk Field, I think, is that right?</p> <p>11 A Yeah.</p> <p>12 Q And then after you left the jail, you told me, 13 but I'm trying to remember, what did you do?</p> <p>14 A Then I went, I went back to Volk Field.</p> <p>15 Q Okay. Did you take a pay cut?</p> <p>16 A I think it was a slight pay cut, but it was 17 better hours and better shift.</p> <p>18 Q So you went into jail because -- corrections 19 because it was a different kind of law 20 enforcement, you said?</p> <p>21 A Yes.</p> <p>22 Q And it paid better?</p> <p>23 A And it paid slightly better, yeah. I was able 24 to broaden my scope of practice, I guess you 25 would say.</p>

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1 Q And you did it basically for about a year,
 2 right?
 3 A At Monroe County, yes.
 4 Q Have you gone back to corrections at all since
 5 then?
 6 A No, I have not.
 7 Q Why did you decide to leave?
 8 A Leave, like, corrections and law enforcement?
 9 Q Why did you decide to leave Monroe County?
 10 A Because I was able to have a better schedule at
 11 Volk Field and then -- mainly just a better
 12 schedule. Because I had a good schedule before
 13 I came to Monroe County. I knew I was going to
 14 be working a harder, or a little bit more
 15 demanding schedule at the jail, but it was
 16 something different and it was a little bit
 17 higher pay.
 18 Q Did you decide -- was part of your reasoning
 19 you decided you didn't want to work in
 20 corrections?
 21 A For the schedule?
 22 Q Your reason for leaving the jail?
 23 A Yeah.
 24 Q Go ahead.
 25 A Because after awhile too I realized, okay, I

1 MR. WEIL: Mark?
 2 MR. HARDY: No questions. Thank you.
 3 MR. JONES: No questions for me.
 4 He'll read and sign.
 5 MR. WEIL: You're done. Thank you.
 6 (Deposition concluded at 12:25 p.m.)
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1 went to school for law enforcement. I went to
 2 police academy. I'm going to stay on the law
 3 enforcement route and continue on with that.
 4 Q Why did you decide you didn't want to do
 5 corrections as a law enforcement route?
 6 A Because I wanted to be more on the road side of
 7 things.
 8 Q Did you decide you didn't like working
 9 corrections or it wasn't for you?
 10 MR. JONES: Objection to form. Asked
 11 and answered. You can go ahead.
 12 A I didn't -- I thought I did a good job in
 13 corrections. I thought I was professional and
 14 respectful and, but, yeah, I just preferred to
 15 have a little bit more freedom versus doing the
 16 same time as everybody else, but being able to
 17 walk around.
 18 Q Was Ms. Boyer's event, did that have any impact
 19 on your decision to leave the Monroe County
 20 Jail?
 21 A No, it did not.
 22 MR. WEIL: Okay. That's all I have.
 23 Thank you, Mr. Moga.
 24 THE WITNESS: Thank you.
 25 MR. KNOTT: No questions.

1 STATE OF WISCONSIN)
 2 : ss CERTIFICATE
 3 COUNTY OF LACROSSE)
 4
 5 I hereby certify that I reported the
 6 deposition of KYLE MOGA on the 3rd day of
 7 November, 2023, in Sparta, Wisconsin, and that
 8 the witness was by me first duly sworn to tell
 9 the whole truth; that the testimony was
 10 transcribed under my direction and is a true
 11 and complete record, to the best of my ability,
 12 of the testimony of the witness;
 13
 14 That the cost of the original has been
 15 charged to the party who noticed the
 16 deposition, and that all parties who ordered
 17 such copies have been charged at the same rate
 18 for such copies;
 19
 20 That I am not a relative or employee or
 21 attorney or counsel of the parties or a
 22 relative or employee of such attorney or
 23 counsel; that I am not financially interested
 24 in the action and have no contract with the
 25 parties, attorneys or persons with an interest
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WITNESS MY HAND AND SEAL THIS 8TH DAY
 OF NOVEMBER, 2023.

Nancy Johnson
 Registered Professional Reporter
 P.O. Box 21
 La Crosse, Wisconsin, 54601-0021

My Commission Expires
 July 15, 2025

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